

Coordinated Compliance Review

Adult Education

Program Goal

To establish quality instruction for adults in authorized program areas (e.g., elementary and high school basic skills and other courses and classes required for the high school diploma, English as a second language [including ESL-Citizenship], citizenship and workforce preparation for immigrants, parenting, substantially handicapped adults, vocational education, older adults, apprentices, home economics, health and safety) that will (1) enable adults to become literate and obtain the knowledge and skills necessary for employment and self-sufficiency; (2) assist adults who are parents to obtain the educational skills necessary to become full partners in the educational development of their children; and (3) assist adults in the completion of a secondary school education.

Note: This program instrument is a guide for monitoring compliance and, in some cases, contains only a sampling of compliance issues. This document does not cover the complete list of state and federal regulations or other legal mandates governing adult education with which local educational agencies must comply. Please be aware that applicable legal citations for adult education include, but are not limited to, the following:

Workforce Investment Act, Title II; *California Code of Regulations, Title 5*; *California Education Code*; *California State Plan for Adult Education*; and California Department of Education letters and advisories.

Because the methodology of the California Department of Education validation review team includes sampling, the validation review cannot produce an all-inclusive assessment of all the items in this instrument. It is the responsibility of the LEA to ensure that its systems, programs, and related activities comply with all applicable laws, regulations, and directives.

Key Dimensions

- I. Standards, Assessment, and Accountability**
To ensure that all educational programs are based on high and challenging standards and are accompanied by a process for monitoring and determining effectiveness
- VI. Governance and Administration** To ensure that all schools conduct high quality programs that are effectively managed and operated within appropriate legal parameters
- VII. Funding** To ensure that financial plans and practices meet legal requirements and programs operate to achieve the local educational agency's priorities and goals for student success

I

Standards, Assessment, and Accountability

To ensure that all educational programs are based on high and challenging standards and are accompanied by a process for monitoring and determining effectiveness

Compliance Item/Test	Review Level/Guidance	How to Achieve Compliance	Notes
<p>I-A1a All adult education apportionment classes are instructional in nature and meet the required standards of attendance, curriculum, and administration. The adult education program follows uniform complaint procedures.</p> <p>(EC 41976, 46190, 52506, 52518, 52570, 52571; <i>State Budget Act Language</i>, Section 6110-156-001, Provision [g], 1997-98; 5 CCR 4600 - 4671)</p>	<p>Program and Site</p> <ul style="list-style-type: none"> • Review program flier, class schedule, student registration forms, and attendance records for evidence of required standards. • Review the California Department of Education (CDE) letter of approval for the attendance accounting system. • Interview teachers. • Review course outlines and observe classes for evidence that instruction follows course outlines • Review the program's process for determining education goals and learning objectives for each student and for measuring students' progress. • Review educational procedures for students with disabilities. • Review uniform complaint procedures and written evidence that students receive information about them. • Interview students. 	<ul style="list-style-type: none"> • Students have completed all parts of the registration form. • The school district counts attendance only for educational activities. • The district does not report for apportionment more than 15 hours per week of attendance unless the classes are elementary subjects, high school credit classes, English as a second language (ESL), citizenship, or short-term vocational classes with high employment potential. • All classes are instructional in nature and are not designed as therapy, dancing, recreational physical education, or production. • The district has received official approval of the attendance accounting system; a letter from the California Department of Education is on file; and the district counts for apportionment only those students enrolled in approved courses as noted in <i>Attendance Accounting and Reporting in California Public Schools</i> (p. 167). • The district does not count home assignments or homework for apportionment. • The district has a system for identifying student goals, assessing student learning needs, and documenting student progress. • Students are aware of and receive written information about uniform complaint procedures. 	

<p>I-A1b The school district offers all classes for adults wholly within the boundaries of the district unless exempted by <i>Education Code</i> sections 52511(a)(b), 52530, and 52572.</p>	<p>Program</p> <ul style="list-style-type: none"> • Review promotional materials, the schedule of classes, and the list of current sites where the program offers instruction. • Review the map or description of the school district's boundaries. • Review the mailing list for distribution of promotional materials. • Interview the principal, teachers, and students. • All classes that the program offers are within the school district's boundaries • The distribution of promotional materials verifies efforts to reach adults throughout the district. 	
<p>I-A2 Course outlines for all apportionment classes, including those in jails, state hospitals, and convalescent hospitals, contain the six required elements,</p> <p>(EC 52504; 5 CCR 10508[b]; <i>Adult Education Handbook for California</i> [1997]. Section 100)</p> <p>All course outlines contain the following six elements:</p> <ul style="list-style-type: none"> • Goals and purposes • Performance objectives or competencies • Instructional strategies • Units of study, with approximate hours allotted for each unit • Evaluation procedures • Repetition policy that prevents perpetuation of student enrollment 	<p>Program and Site</p> <ul style="list-style-type: none"> • Compare courses offered to those on the approved Course Approval Request Form. • Review course outlines. • There is a current course outline for each course listed on the school district's approved Course Approval Request Form for the current year. • All course outlines include the required terminology: goals and purposes, performance objectives or competencies, instructional strategies, units of study with approximate hours for each unit, evaluation procedures, and a policy that prevents perpetuation of student enrollment through the practice of repeating classes. 	

<p>I-A3 The agency has implemented the standards described in English as a <i>Second Language: Model Standards for Adult Education Programs</i> for all English-as-a-second language (ESL) (including ESL-Citizenship) classes funded by state apportionment. (EC 52506; <i>Adult Education Handbook for California</i> [1997], Section 203; <i>English as a Second Language: Model Standards for Adult Education Programs</i> [1992])</p>	<p>Program and Site</p> <ul style="list-style-type: none"> • Review ESL (including ESL-Citizenship) course outlines for elements of model standards. • Review the ESL staff development plan and its implementation • Interview the adult education director, ESL (including ESL-Citizenship) coordinator, and teachers. • Interview ESL and ESL-Citizenship enrollees. • Observe ESL (including ESL-Citizenship) classroom instruction, which must be in English. <ul style="list-style-type: none"> • The curriculum shows evidence of an articulated sequence of ESL courses from ESL beginning literacy through ESL advanced high levels. • ESL course outlines contain the seven levels of language proficiency and reflect the four categories of general standards in the outcomes and the nine general standards of testing in assessment. • Curriculum, course outlines, teaching behaviors, and staff development reflect a system for and show evidence of implementation of the model standards, including ESL instruction in English. 	
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<p>-A4 If the school district grants an adult school diploma, the standards for the diploma meet the requirements of the <i>Education Code</i>.</p> <p>Requirements for granting the adult school diploma meet the standards set by the <i>Education Code</i> as follows:</p> <ul style="list-style-type: none"> • 3 years of English • 2 years of mathematics • 2 years of science, including biological and physical science • 3 years of social studies, including 1 year of U.S. history and geography; 1 year of world history, culture, and geography; 1 semester of American government and civics; and 1 semester of economics • 1 year of visual or performing arts or a foreign language (may be American Sign Language) • 2 years of physical education (unless exempted by local policy) • Other course work as the governing board of the school district may by rule specify <p>(EC 51225.3)</p>	<p>District and Program</p> <ul style="list-style-type: none"> • Review board policy. • Review evidence that classes for the adult education diploma reflect the California Department of Education model curriculum standards. 	
<p>I-A5 Before establishing a vocational or occupational education program, the agency shall conduct a job market study of the labor market area where it will establish the vocational program to justify the establishment of the proposed course of instruction.</p> <p>(EC 52519, 52520)</p>	<p>District</p> <ul style="list-style-type: none"> • Review the job market study for evidence of the need for vocational programs offered. • The district has conducted job market surveys for all vocational courses and programs it offers. • Job market surveys are current within the last two years. • The local governing board approved the course or the contract with an approved private postsecondary school. 	

<p>I-A6 The school district collects and reports data required by state regulations. (SB 645, Chapter 771, Statutes of 1995)</p>	<p>District</p> <ul style="list-style-type: none"> • Review the school district's data collection process and documentation for the adult education program. • Interview the chief fiscal officer. • Review the district's CalWORKs and Performance-Based Accountability reports submitted by August 15. • The agency collects and reports adult education student data, including information on types and amount of services provided to program participants, characteristics of participants, and pupil and program outcomes. • Agencies receiving funds for training of CalWORKs eligible students collect program and participant data specified in the Required Data Elements Record Layout. • The agency collects and reports data for all students enrolled in vocational programs who meet Performance-Based Accountability criteria. (Students must enroll in classes scheduled for a minimum of 12 hours per week, attend 20 hours or more in those classes, and sign "yes" on the PBA Privacy Notice and Student Consent Form.) 	
<p>I-A7 In classes for adults with disabilities, the district assesses the capacity of each student for learning and progress before the student enrolls in the program. (EC 52506, 52570)</p>	<p>District and Site</p> <ul style="list-style-type: none"> • Review assessment, registration, and attendance records of students. • Review the district's process of assessing the capacity of each individual for learning and progress. • Examine assessment tests used to gauge students' progress. • The district regularly evaluates students' progress to ensure that students are progressing toward their educational goals. • The district allows students to continue their enrollment in the program on evidence of the students' ability to attain their educational goals. 	



Governance and Administration

To ensure that all schools conduct high-quality programs that are effectively managed and operated within appropriate legal parameters

<i>Compliance Item/Test</i>	<i>Review Level/Guidance</i>	<i>How to Achieve Compliance</i>	<i>Notes</i>
VI-A8a All teachers of adult education classes are part of the adult school faculty and are under the direct supervision of the adult education administrators. (EC 52523[b])	District <ul style="list-style-type: none">• Interview the teacher, director, and/or administrator.• Examine the organizational chart.	<ul style="list-style-type: none">• The adult school administrator supervises all adult school faculty.• The program organizational chart shows that the adult school administrator supervises teachers in the adult education program.	
VI-A8b For apportionment purposes, the computation includes only the attendance of students under the immediate supervision and control of an employee of the district who possesses a valid, registered, and appropriate certification document. (EC 46300[a])	District and Site <ul style="list-style-type: none">• Observe classes.• Interview the director, teachers, and aides.• Confirm the relationship between teacher aides who work directly with students and the credentialed teacher.• Review credential documentation.	<ul style="list-style-type: none">• Credentialed school district employees supervise all apportionment classes and are responsible for the delivery of educational services in classes for which the district claims apportionment.• Teacher aides working with students carry out the instructional program of the credentialed teacher.• The credentialed teacher is responsible for the students.	

<p>VI-A9 To be eligible for state apportionment, classes for adults are located in facilities clearly identified in such a manner to ensure that attendance in such classes is open to the general public; classes in correctional facilities and classes for adults with disabilities are excepted.</p> <p>(EC 52517, 52570)</p>	<p>District and Site</p> <ul style="list-style-type: none"> • Visit class sites. • Review promotional materials. • All classes (except those for students in correctional facilities and students with disabilities) are open to all adult students. • The district informs the general adult public about all adult education opportunities. • The district does not exclude students from classes, except when classes reach the maximum attendance levels set by the district. • Promotional materials list all classes offered. • A sign visible to the public identifies all instructional sites, including nursing homes, convalescent hospitals, community centers, churches, and so forth. 	
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VI-A10 The minimal time assignments of properly credentialed personnel used exclusively for administration, supervision, evaluation, curriculum development, and counseling and guidance services in an adult school are met and are based on the number of average daily attendance (a.d.a.) units of the preceding fiscal year.

(5CCR 10560[b][c])

District

- **Review** appropriate time sheet records.
- **Interview** the director.
- **Examine** the job descriptions for administrative, supervisory, evaluation, curriculum development, and counseling and guidance personnel funded by adult education monies.
- **Ensure** that minimal time assignments for a.d.a. of the preceding fiscal year are as follows:

100-199	One-half time of one administrator
200-299	One full-time administrator
300-399	One full-time administrator and one-fourth time of one other person
400+	One full-time administrator and one-half time of one person for each 200 units of such a.d.a. in excess of 200
a.d.a.	Days
15	15
30	30
75	75
90	90

(Partial days may be added to equal a day.)

- Time accounting for properly credentialed personnel for adult classes maintained in conjunction with other schools/centers (Programs with less than 100 a.d.a.) for administrative, supervisory, evaluation, curriculum development, and counseling and guidance services amounts to a minimum of one day per year for each unit of a.d.a. Generated by adults in classes during the preceding fiscal year.
- Partial days are added to equal a day.
- When a district maintaining classes for adults in connection with a high school has a total a.d.a. Of 100 or more in the preceding fiscal year, the governing board shall establish a separate adult school as a separate administrative unit.

<p>VI-A11a The district does not claim apportionment for students enrolled in a course that the California Department of Education has not approved as being within one of the ten program areas.</p> <p>(EC 41976, 52515)</p>	<p>District and Program</p> <ul style="list-style-type: none"> • Review approved Adult Education Course Approval Request Forms. • Review promotional materials and compare them with the approved Adult Education Course Approval Request Form. • Note whether brochures, schedules, and records list separately the state-funded and community service classes. • The district maintains a file of the approved Adult Education Course Approval Request Forms for all state apportionment courses. • All state-funded classes listed in promotional materials are on the approved Course Approval Request Form for the current year. • In promotional materials the agency clearly identifies state-funded classes and separates them from fee-based, community service classes, which are clearly indicated as such. 	
<p>VI-A11b The school district claims student attendance only for students who meet the rules for attendance.</p> <p><i>(Attendance Accounting and Reporting in California Public Schools; 5 CCR 404, 406[b])</i></p>	<p>District and Program</p> <ul style="list-style-type: none"> • Review directions given to teachers for marking attendance and teachers' attendance sheets. • Review attendance records for evidence that the district separately determines each hour or portion of an hour of a student's attendance claimed for apportionment • If a student is present for any part of a scheduled hour or scheduled partial hour, the district can claim the student's attendance for the full hour or scheduled partial hour. • The district claims the student attendance for a following hour or scheduled portion of an hour of the same class only when the student is present for some part of that hour. • The district claims attendance of students in a "laboratory" setting only for the amount of time that the student actually attended. 	

<p>VI-A12 The school district expends adult education funds only for direct instructional cost, direct support cost, and indirect cost. The district uses one of two methods, <i>either</i>:</p> <ul style="list-style-type: none"> • Direct instructional cost and direct support cost with auditable documentation and indirect cost limited to the lesser of the district's prior year approved indirect cost rate or the statewide average indirect cost rate for the second prior year <p>or</p> <ul style="list-style-type: none"> • Direct instructional cost and 8 percent of the annual revenue deposited in the school district's adult education fund <p>(EC 52616.4)</p>	<p>District and Program</p> <ul style="list-style-type: none"> • Review documentation for direct support costs and indirect costs. • Review documentation that supports nonpersonnel costs, substantiating that the adult education program received the service, supply, or equipment. • Interview the director. • Look for auditable documentation for each charge made against the adult education fund. (Would this cost occur if there were no adult education program?) • Review budget documents to verify income and expenditures, any transfers between funds, and charges to the adult school budget. • Interview business office personnel. • Review income and expenditure reports. <ul style="list-style-type: none"> • There are no improper transfers between funds; that is, transfers from adult education funds into general funds or from general funds into adult education funds. • All charges in the adult school budget are solely adult school expenses. • There is documentation for each charge. • Current records exist to support personnel costs. • Job descriptions of administrative and supervisory personnel include adult education responsibilities proportionate to the percentage of salary paid by adult education funds. • Documentation shows compliance with requirements set forth in the <i>California School Accounting Manual</i>. 	
<p>VI-A13 No charge of any kind shall be made for a class in English and citizenship for foreigners, a class in an elementary subject, or a class designated by the governing board as a class for which high school credit is granted when the class is taken by a person who does not hold a high school diploma.</p> <p>(EC 52612)</p>	<p>District, Program, and Site</p> <ul style="list-style-type: none"> • Review promotional materials for references to fees. • Review budget documents for income from fees. • Interview the director about district policy on charges for students enrolled in ESL. (including ESL-Citizenship), citizenship education, elementary subjects, or high school credit courses • Interview students enrolled in ESL (including ESL-Citizenship), citizenship education, elementary subjects, and high school credit classes about whether the district charges them any registration, tuition, or other fees. <ul style="list-style-type: none"> • The district does not charge fees of any kind to students in ESL (including ESL-Citizenship), citizenship education, or elementary subjects. • Students may purchase books and materials, but the district does not require students to do so as a condition of enrollment or attendance. 	

<p>VI-A14 Except as specified above, the governing board of the district may require adults to pay a fee for the class. The district . . . may fix a charge not to exceed the cost of the books to the district for books furnished pupils in classes for adults [or] may lend books to such pupils and require the making of deposits . . . to be refunded ... upon the return . . . of the books. (EC 52612, 60410)</p>	<p>District, Program, Site</p> <ul style="list-style-type: none"> • Ask students whether the district provides materials and books free of charge for use in classes. • Ask how the district determines the cost of books available for sale to students. • The charges for books and materials to students do not exceed the cost, of those books and materials to the district. (The charge may include handling and storing.) • For a high school credit class, the district collects fees only for materials and laboratory when a person who does not hold a high school diploma takes such a class. 	
<p>VI-A15 No school district shall file for state apportionment funds if the district receives full compensation for such class from any public or private agency, individual, or group of individuals, except for fees authorized by <i>Education Code</i> Section 52612. (EC 51814, 52517)</p>	<p>District and Program</p> <ul style="list-style-type: none"> • Review the budget. Review class fees. • Review cash deposits. • Interview the director about whether there are contract classes (workplace-based, JTPA, and others) that fully fund the cost of instruction. • Compare the budgets for state-funded classes with those for community service and contract classes. • Determine whether the district separates attendance reports of state-funded classes from those of contract and community service classes. • Attendance reports from community service and contract classes are not commingled with those of authorized apportionment classes. • Budget income and expenses from community service and contract classes are not commingled with those of authorized apportionment classes 	

<p>VI-A16 The district cannot claim any apportionment for high school students enrolled in adult courses in physical education, driver's education or training, music, band, drama, yearbook, athletic/activity camps, health and safety, and home economics or in courses for older adults, handicapped adults, or apprentices.</p> <p>(EC 52500.1 [a], 52523[e])</p>	<p>Program and Site</p> <ul style="list-style-type: none"> • Review student attendance and enrollment records. • Review records of required counseling sessions for concurrent students. • High school students are enrolled only in authorized adult education courses. 	
<p>VI-A17 A student enrolled in a high school program may enroll concurrently in classes for adults only after attending for the full time scheduled as the length of the regular school day or the continuation school day as designated by the local district governing board.</p> <p>(EC 48200, 52523; <i>Adult Education Handbook for California</i> [1997], Section 215.10)</p>	<p>District and Program</p> <ul style="list-style-type: none"> • Review students' records and schedules. • Interview the high school director, counselors, and adult education director about how they ensure that high school students attending adult education courses have met the full regular-day attendance requirement. • Attendance records and student interviews indicate that concurrent students have attended the comprehensive or continuation high school for the full time scheduled as the length of the regular school day before attending the adult school program. • District policy on concurrent enrollment relates to the CDE letters (Agee, 1/20/95; Whitmore 6/27/95) on Adult Education Conditional Waiver and Agreement. 	

VI-A18 The district does not use the adult education program to supplant the district's high school program. Enrollment of a high school pupil in an adult education program, course, or class is for sound educational purposes.
(EC 52523)

District, Program, and Site

- **Observe** classes.
- **Examine** local board policy on concurrent enrollment of high school students in adult education.
- **Review** student records.
- **Interview** high school counselors.
- **Interview** concurrently enrolled high school students.
- **Review** the counseling session notes and forms for concurrently enrolled students.
- **Interview** the director.
- **Determine** whether high school students are the primary attendees at any adult education classes during the high school day.
- **Examine** board policy on the adult school diploma program and evidence that the adult school is prepared to offer all courses for the high school diploma.
- The high school student is enrolled in adult education for sound educational purposes that are consistent with the requirements of the Education Code.
- Students attending all adult education classes offered on the high school site during the high school day are predominantly adults.
- Adult education promotional materials list all adult education classes offered during the high school day, including those that concurrently enrolled students attend.
- The content and methods used in the adult education classes are consistent with the adult education course outlines on file.
- Sound educational purposes may be that the adult education program, course, or class:
 1. Is not offered in the regular high school Curriculum
 2. Is needed by the pupil to make up deficient credits for graduation from high school on time
 3. Allows the pupil to gain vocational and technical skills, provided the regular high school does not offer a program of vocational and technical education
 4. Supplements and enriches the high school pupil's educational experience
- The adult school is prepared to offer all courses required for the adult school diploma and does not supplant the district's regular high school program by offering only a few high school courses without board approval for the adult school diploma.

<p>VI-A19a Adults have priority over high school students in all adult education classes.</p> <p>(EC 52523[a])</p>	<p>District and Program</p> <ul style="list-style-type: none"> • Review marketing materials for evidence that adults have priority for enrollment. • Review and tabulate registration forms for evidence that predominantly and primarily adults attend adult education classes. • The district gives priority to adults for all classes the adult school offers, • The district excludes no adult from any class designated as an adult education class that concurrent students attend. • All classes are open for enrollment to all adult students. 	
<p>VI-A19b Classes offered to concurrently enrolled students are part of the regular adult education program and meet all course requirements for adult education.</p> <p>(EC 52523)</p>	<p>District and Program</p> <ul style="list-style-type: none"> • Examine board policy on the concurrent enrollment of high school students in the adult education program. • No class is limited to concurrently enrolled students. 	

VI-A20a The governing board has adopted an independent study policy that meets current legal requirements. (EC 46300.4, 51747)

District and Program

- **Review** the district's Independent Study Policy and administrative regulations for evidence of specific procedures and criteria for independent study, including:
 - Limiting of independent study instruction to courses that meet high school diploma requirements
 - Maximum time that may elapse between the receipt of an assignment and the student's completion of it
 - Required scheduling of a traditional class setting for all courses also offered through independent study
- **Review** students' contracts for evidence that the district limits independent study to courses that meet the requirements for the high school diploma and that the district meets the master student contract requirements.
- **Interview** the teacher and administrator to determine that independent study courses meet the requirements for a high school diploma.
- **Review** promotional materials, class schedules , and attendance records to verify that independent study is not the only mode of delivery of instruction.
- The district policy specifies the maximum time that may elapse between the date an independent study assignment is given and the date the student must complete it.
- Independent study guidelines include a system for reviewing the appropriateness of independent study for a particular student, criteria include identifying the number of missed assignments allowed before the policy requires the student to terminate the independent study program.
- The school maintains a current written agreement for each independent study pupil; and the district meets the master student contract requirements, which include specific independent study outcomes and guidelines.
- Promotional materials and registration and attendance records indicate that students may enroll in traditional classes as well as independent study modes for the same courses.

<p>VI-A20b Administrative regulations or written procedures limit claims for apportionment to no more than three hours of independent study per day or 15 hours per five-day week for each student in adult education. The district cannot claim for independent study total number of hours the district more hours than the total number of hours of classroom instruction for the same courses.</p> <p>(EC 46300[e]; CDE Legal Opinion)</p>	<p>District and Program</p> <ul style="list-style-type: none"> • Review student enrollment and attendance records to verify that students do not generate more hours in independent study than the total number of hours the district offers classroom instruction for the same courses. • Staff interviews reflect a system for ensuring that each adult student in independent study does not generate apportionment for more than 3 hours per day and for not more than the total number of hours of classroom instruction the program offers for high school subjects. • The adult education apportionment for each student in independent study is limited to 3 hours per day. (For graduation credit purposes the student may earn more than 3 hours of credit per day.) • Attendance records show that for each independent study student, the district does not claim more than the total number of hours of classroom instruction it offers in adult education for high school subjects or more than 3 hours per day. 	
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Funding

To ensure that financial plans and practices meet legal requirements and programs operate to achieve the local educational agency's priorities and goals for student success

Agencies which receive federal funds for Adult Basic Education, English as a Second Language (including ESL-Citizenship), Workplace-Based Literacy, Family Literacy, and Adult Secondary Education must meet the criteria established in the Workforce Investment Act, Title 11-Adult Education and Family Literacy, P.L 105-220, cited here as Adult Education and Family Literacy Act, 20 USC 9241.

<i>Compliance Item/Test</i>	<i>Review Level/Guidance</i>	<i>How to Achieve Compliance</i>	<i>Notes</i>
VII-A21 Each local provider follows all federal and state plan rules and regulations for each priority for which it receives funds and follows uniform complaint procedures. (Adult Education and Family Literacy Act, 20 USC 9241 <i>California State Plan 1999-2004</i> , Chapter 3)	Agency <ul style="list-style-type: none">• Review student files and agency records regarding required activities for the priorities and the components for Priorities 2 and 4.• Examine evidence that the agency and students meet all requirements for components.• Examine agency files, brochures, and publicity materials for evidence of the uniform complaint procedure and its availability to all students.• Interview students about the components and the uniform complaint procedure.	<ul style="list-style-type: none">• The agency has records showing how it meets the components for Priorities 2 and 4.• The agency has a uniform complaint procedure, which it follows and displays.• Students are aware of the uniform complaint procedure.	

<p>VII-A22 Local providers will demonstrate a commitment to serving the individuals most in need, as described in Priorities 1, 2, and 3. The agency has in place a plan for determining and addressing additional literacy needs in the community.</p> <p>(Adult Education and Family Literacy Act, 20 USC 9241; <i>California State Plan 1999-2004</i>, Chapter 6)</p>	<p>Agency</p> <ul style="list-style-type: none"> • Review files on local demographics and community needs assessments. • Review enrollment and attendance data. • Examine outreach and recruitment activities, such as fliers and newspaper, radio, or TV announcements. • Review data indicating the percentage of the unserved target population in the agency's priority levels. • Review the agency's plan or process for frequent needs assessment and evaluation of the agency's success in meeting community needs. <ul style="list-style-type: none"> • Data-based community needs assessments support the, number or percentage of local residents needing literacy programs. • Attendance data and increased enrollment verify the effectiveness of recruitment or outreach documents and activities. • Documents such as charts, partnership agreements, or strategic plans show a "continuum of service," describing programs that demonstrate service to the most-in-need targeted populations. • The agency has a regular process of assessment to identify community needs and bases its program on those needs. • The agency changes its instructional program according to community needs. 	
<p>VII-A23 The agency has measurable goals and/or proficiency levels for learner outcomes for each priority level for which it receives federal funds.</p> <p>(Adult Education and Family Literacy Act, 20 USC 9241; <i>California State Plan 1999-2004</i>, Chapter 6)</p>	<p>Agency</p> <ul style="list-style-type: none"> • Review the agency's goal statement or strategic plan both for benchmarks and for additional learner goals. • Check for goals for Adult Basic Education (ABE), ESL (including ESL-Citizenship), Family Literacy, Workplace-Based Literacy, and Adult Secondary Education (GED or high school diploma). • Review course outlines. • Review the agency's system for routine monitoring of goals and objectives, including identified monitoring dates throughout the year. • Review the assessment of the goals and proficiency levels for alignment with relevant CDE model program standards. <ul style="list-style-type: none"> • All goals must be measurable and should specify the target measure for the year and how individual learners attain targeted goals. • Measures include learner level accomplishments; instructional activity; promotion, completion, and retention data (exit criteria); and program improvement strategies. • Course outlines contain goals. • The agency has set and is monitoring appropriate goals for workplace-based and family literacy programs. 	

<p>VII-A24 The agency provides a written description of the minimum qualifications that instructors, tutors, counselors, coordinators, and administrators must have to work in the program.</p> <p>(Adult Education and Family Literacy Act, 20 USC 9241; <i>California State Plan 1999-2004</i>. Chapter 6)</p>	<p>Agency</p> <ul style="list-style-type: none"> • Review job announcements or descriptions, duty statements, and hiring procedures. • Review the annual staff development plan and records and evidence of training for both staff members and volunteers. • Records of staff hiring interviews reflect a screening process for identifying qualified applicants. • Personnel records include documentation of instructors' qualifications. • Staff training records reflect the use of courses, in-service training, mentoring, or other learning situations to remediate staff skill deficiencies and assure acquisition of new information. • Staff training records show that administrators participate in ongoing training in administrative and management theory and practice. • Training on counseling activities and techniques is available for appropriate staff. 	
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<p>VII-A25 The agency documents learner progress. Documented learner progress includes literacy skill-level improvements in reading, writing, and speaking the English language, in English language acquisition, and in problem solving, numeracy, and other literacy skills; placement in, retention in, or completion of postsecondary education, training, or unsubsidized employment or career advancement; a secondary school diploma or its equivalent; and attainment of learner-identified learning goals.</p> <p>(Adult Education and Family Literacy Act, 20 USC 9212; <i>California State Plan 1999-2004</i>, Chapter 4)</p>	<p>Agency and Site</p> <ul style="list-style-type: none"> • Review student files and portfolios. • Review Management Information System (MIS) reports. • Verify that pretests and post-tests are appropriate, are clearly labeled, can be differentiated, and indicate learner Progress. • Literacy skill-level improvements in reading, writing, and speaking the English language are documented. • English language acquisition occurs. • Learners acquire problem-solving, numeracy, and other literacy skills. • Placement and retention in or completion of postsecondary education, job training, or unsubsidized employment or career advancement occurs. • Learners earn a secondary school diploma or its equivalent. • Attainment of learner-identified learning goals occurs. 	
<p>VII-A26 The agency has in place a Management Information System that records participant outcomes and can monitor program performance against state performance standards.</p> <p>(Adult Education and Family Literacy Act, 20 USC 9241; <i>California State Plan 1999-2004</i>, Chapter 6)</p>	<p>Agency and Site</p> <ul style="list-style-type: none"> • Review the TOPSpro or comparable system approved by the Department of Education, including entry and update records and summary reports. • Verify that pretests and post-tests of individual students are appropriate, are clearly labeled, can be differentiated, and indicate student progress. • The MIS produces reports showing core performance indicators, including skills improvement, movement to secondary education, getting a job or a better job, or obtaining a high school diploma or equivalent. • The agency uses MIS data for a variety of purposes, including tracking learner gains; identifying successful instruction, program assessment, and improvement; and tracking achievement of assessment benchmarks and core indicators. 	

VII-A27 The agency has on file data showing how it continues to improve, compared with the previous year, the literacy skills of participants for each priority level for which it receives federal funds.

(Adult Education and Family Literacy Act, 20 USC 9241; *California State Plan 1999-2004*, Chapter 6)

Agency and Site

- **Review** evidence (MIS reports or other data) showing learners' gains in CASAS terms to indicate past effectiveness.
- **Review** the process used to evaluate data for program improvement.
- **Review** evidence that the agency uses the appropriate assessments outlined in the relevant model program standards documents and presented in current accountability training and documents.
- **Interview** the director, program coordinator, and teachers to determine how they use MIS reports for student feedback and program assessment and improvement.
- Year-end reports and other documents show learner progress and are the basis for evaluating program effectiveness.
- The agency documents the numbers or percentages of learners completing courses and evaluates course completion data in comparison with those of other agencies or regions.
- The agency has a process or plan to determine past effectiveness.

VII-A28 The agency provides evidence of sufficient intensity and duration of the program for participants to achieve substantial learning gains.

(Adult Education and Family Literacy Act, 20 USC 9241; *California State Plan 1999-2004*, Chapter 6)

Agency and Site

- **Review** instructional activity schedules; recruitment brochures, fliers, and advertisements; and the yearly calendar for the agency.
- **Review** evidence that learners are progressing at a reasonable pace and making substantial learning gains.
- **Review** descriptions of individualized learning options.
- **Interview** learners who selected these options.
- **Review** the agency's data from workplace-based instruction and other individualized approaches that compare results with data from traditional instructional settings.
- **Review** the attendance accounting system and summary attendance reports. **Examine** the reasonableness of attendance reports (i.e., reports do not include national holidays and Sundays, and all students do not have perfect attendance).
- **Review** course outlines.
- **Observe** classroom instruction.
- Attendance data verify the successful intensity and duration of the program.
- Program outcomes confirm effective educational practices, such as intake procedures, testing frequency, and varied instructional activities.
- Attendance forms show the hourly recording of attendance for each student and contain the signatures of persons responsible for verifying the accuracy of the attendance records.
- The reviewer can trace attendance data indicated on CASAS test records to daily attendance forms through a process for compilation.

<p>VII-A29a The agency bases adult educational practices, including those related to the teaching of reading, on a solid foundation of research and effective practices, including model program standards.</p> <p>(Adult Education and Family Literacy Act, 20 USC 9241, <i>California State Plan 1999-2004</i>, Chapter 6)</p>	<p>Agency and Site</p> <ul style="list-style-type: none"> • Review evidence that the agency selects practices backed by research for each funded priority and instructional area. • Determine how the agency implements the relevant model program standards and whether it includes SCANS competencies for each funded priority. • Observe instruction for evidence of appropriate practices. • Interview instructors and learners. • Staff members have completed training on the relevant model program standards. • Staff members have completed training on SCANS competencies, or the agency has developed a plan for providing information on SCANS. • Interviews with instructors and students and classroom observations indicate the use of a variety of teaching and learning modalities. • Staff development records reflect instruction in various teaching and learning modalities. 	
<p>VII-A29b The agency has implemented model program standards for adult education programs for all ABE, ESL (including ESL-Citizenship), and Adult Secondary Education (ASE) classes.</p> <p>(Adult Education and Family Literacy Act, 20 USC 9241; <i>California State Plan 1999-2004</i>, Chapter 6)</p>	<p>Agency and Site</p> <ul style="list-style-type: none"> • Review ABE, ESL (including ESL-Citizenship), and ASE course outlines for elements of model standards. • Review ABE, EST, (including ESL-Citizenship), and ASE staff development plans and their implementation. • Interview the adult education director, ABE, ESL (including EST-Citizenship), and ASE coordinators and teachers. • Interview students from ABE, EST, (including ESL-Citizenship), and ASE courses. • Observe classroom instruction in ABE, ESL (including ESL-Citizenship), and ASE courses. • The curriculum shows evidence of an articulated sequence of courses from beginning through advanced levels for ABE, ESL (including ESL-Citizenship), and ASE. • ABE, ESL (including ESL-Citizenship), and ASE course outlines contain all the levels of language proficiency and reflect the categories of general standards in outcomes and the categories of testing in assessment. • Curriculum, course outlines, teaching behaviors, and staff development reflect a system for and show evidence of the implementation of the model standards, including instruction in English 	

<p>VII-A30 The program provides learning in real-life contexts to ensure that learners obtain the skills to compete in the workplace and exercise the rights and responsibilities of citizenship.</p> <p>(Adult Education and Family Literacy Act, 20 USC 9241; <i>California State Plan 1999-2004</i>, Chapter 6)</p>	<p>Agency and Site</p> <ul style="list-style-type: none"> • Review instructional materials, books, and curriculum. • Observe instruction. • Interview instructors and learners. • Learners demonstrate specific real-life skills as a part of the evaluation process. • The agency integrates in the course of study real-life lessons appropriate to the personal goals, age, and skill level of the learner. • The agency integrates the acquisition of basic skills with real-life skills. 	
<p>VII-A31 The agency coordinates activities with elementary and secondary schools, postsecondary institutions, one-stop centers, job training programs, private sector partnerships, social service agencies, and other appropriate resources in the community to augment services.</p> <p>(Adult Education and Family Literacy Act, 20 USC 9241; <i>California State Plan 1999-2004</i>, Chapter 6)</p>	<p>Agency and Site</p> <ul style="list-style-type: none"> • Review memoranda of understanding or other evidence of collaboration. • Read minutes of meetings of collaborating groups. • Interview counselors and learners. • Review the student referral process. • Review printed materials available on site about the services of other agencies. • Documents reflect procedures for referring students to other agencies for resources and for receiving referrals of students from other agencies. • Memoranda of Understanding document the formal relationships among collaborating agencies. • A variety of printed materials about other agencies is available at the site. • Collaborative services are available at the site. • Agency records reflect successful attempts to remove barriers for participants (such as child care or transportation problems). • Only one of the collaborating agencies uses the student attendance and performance data records for federal adult education funding. 	

<p>VII-A32 The agency uses both flexible scheduling and support services to enable all students to attend and complete programs.</p> <p>(Adult Education and Family Literacy Act, 20 USC 9241; <i>California State Plan 1999-2004</i>, Chapter 6)</p>	<p>Agency and Site</p> <ul style="list-style-type: none"> • Review agreements with other agencies that provide support services. • Visit sites of instructional activities. • Interview learners. • Compare attendance records at various sites and of various times and formats. Compare with needs assessments. • Observe whether buildings and instructional areas are barrier-free. • Support services, such as counseling, child care, transportation, and career development, are available at the site or through referral. • Agency collaborations include employment and workforce development agencies and one-stop centers. • The agency has removed barriers and makes accommodations for learners' disabilities. 	
<p>VII-A33 The agency uses the federal grant or contract to supplement an ongoing program provided by the applicant agency.</p> <p>(<i>California State Plan 1999-2004</i>, Chapter 6)</p>	<p>Agency and Site</p> <ul style="list-style-type: none"> • Review past budget and financial records of the non-grant base literacy program as well as promotional materials, registration and attendance records, course outlines, and curriculum. • Review MIS reports on classes from the previous year. • Interview instructors or contact former students. • Financial records indicate fiscal resources besides those from federal sources. • Past fliers, brochures, and public service announcements indicate the promotion of the program in the past. • Registration and attendance records show that the agency's ongoing program operated in the past. • MIS reports show goals achieved by students, in the literacy program in the past. 	

<p>VII-A34 Funds made available for adult education under the grant supplement and do not supplant other state and local public funds expended for adult education and literacy activities.</p> <p>(Adult Education and Family Literacy Act, 20 USC 9241; 20 USC 9225; <i>California State Plan 1999-2004</i>, Chapters 1 and 4)</p>	<p>Agency</p> <ul style="list-style-type: none"> • Review the agency's current budget and financial records. • Interview the budget office staff. • Interview the director of the adult education program regarding the primary source of funding for literacy instruction. • Review the agency's claims for reimbursement. • Review evidence that the community-based organization Board of Directors authorized the agency executive director to apply for federal funds. <ul style="list-style-type: none"> • Current financial records indicate expenditure of funds from other state and local public funds for the base funding of the ongoing literacy instructional program. • Current financial records and receipts show expenditures of funds from federal adult education grants only for approved supplemental instructional materials and support services. • Minutes of Board of Directors' meetings or other records document the board's approval for the application for these federal funds. 	
<p>VII-A35 The agency does not spend more than five percent of the grant or contract on administration unless CDE has approved a different rate.</p> <p>(Adult Education and Family Literacy Act, 20 USC 9223; <i>California State Plan 1999-2004</i>, Chapter 6)</p>	<p>Agency</p> <ul style="list-style-type: none"> • Review the federal adult education funds budget and current financial records. • Interview the director of the adult education program regarding types of grant expenditures. • Interview the budget office staff. • Review sample budget expenditures and financial records. <ul style="list-style-type: none"> • Budget categories and financial records and receipts clearly identify planned and current actual expenditures of all grant funds in approved categories. • The agency spends not less than 95 percent of the grant for adult education and literacy activities and uses the remaining amount, not to exceed 5 percent, for planning, administration, and interagency coordination. • The agency expends funds only for categories specified under allowable program costs: certified salaries, classified salaries, employee benefits, books and supplies, services, and other operating expenses as found in the <i>California School Accounting Manual</i>. • Financial records show that all expenditures fall within the five categories allowed for program costs. 	

<p>VII-A36a Articles of Incorporation, filed with the Secretary of State's Office, are a requirement for each community-based organization receiving federal adult education funds.</p> <p><i>(Corporations Code 5120)</i></p>	<p>Agency</p> <ul style="list-style-type: none"> • Review a copy of the Articles of Incorporation. • The Articles of Incorporation demonstrate that the agency is currently registered with the Secretary of State's Office as a nonprofit entity. • Articles of Incorporation state that the Board of Directors has full charge of property and business and the Executive Director is an advisor and consultant to the board. 	
<p>VII-A36b Community-based organizations, existing as nonprofit agencies, must have on file an approved Franchise Tax Exemption Application and an Internal Revenue Service Tax Exemption Application.</p> <p><i>(California Revenue and Tax Code 23701[d]; Internal Revenue Code 501[c] [3])</i></p>	<p>Agency</p> <ul style="list-style-type: none"> • Confirm that these approved state and federal tax exemption applications are on file. • A review of these documents provides further evidence that the agency has nonprofit status. 	
<p>VII-A36c Each community-based organization must file a Registration and Periodic Report (Charitable Trust [CT-2] form) annually with the Attorney General's Office, unless exempt.</p> <p><i>(California Government Code 12580 et seq.)</i></p>	<p>Agency</p> <ul style="list-style-type: none"> • Review the CT-2 form. • The CT-2 form demonstrates that the agency has maintained the legal nonprofit and tax exempt status by annually filing the CT-2 form with the Attorney General's Office, Registry of Charitable Trusts, unless exempt. An agency is exempt from this requirement if the Attorney General's Office has approved it for extended reporting status. A new community-based organization has up to one and one-half years after it receives assets before it must submit its CT-2 form. 	

<p>VII-A36d All agencies required to file the CT-2 form with the Attorney General's Office must have on file the most recently required IRS 990 or 990EZ form.</p> <p>(<i>California Government Code</i> 12580 et seq.)</p>	<p>Agency</p> <ul style="list-style-type: none">• Review the IRS 990 or 990EZ form.• The IRS 990 or 990EZ form demonstrates that the agency files required tax documents.	
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